

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES COLD STORAGE, LLC,

Plaintiff,

v.

HARBOR FREIGHT TOOLS USA, INC. and
A.E.D.S. LLC,

Defendants.

CIVIL ACTION NO.:

3:21-CV-01161-KM

JURY TRIAL DEMANDED

**DEFENDANT, A.E.D.S., LLC'S MOTION FOR EXTENSION OF TIME TO RESPOND
TO PLAINTIFF'S COMPLAINT**

1. On June 30, 2021, Plaintiff, United States Cold Storage, LLC filed a Complaint against Defendants, Harbor Freight Tools USA, Inc., and A.E.D.S., LLC.

2. Defendant, A.E.D.S., LLC was served on July 12, 2021.

3. Due to a delay of Defendant in notifying defense counsel of service, an Answer to Plaintiff's Complaint has not yet been filed on behalf of A.E.D.S., LLC.

4. Defendant, A.E.D.S., LLC respectfully requests an extension of twenty (20) days to file its Answer or otherwise respond to Plaintiff's Complaint.

5. No party to this action will be prejudiced by the requested extension.

6. Pursuant to the local rules, counsel for Defendant, A.E.D.S., LLC has sought a concurrence from Plaintiff's counsel.

7. Plaintiff's counsel concurs with this Motion and has no objection to an extension to file an Answer to Plaintiff's Complaint.

WHEREFORE, Defendant, A.E.D.S., LLC, requests this Honorable Court grant a twenty (20) day extension of time to Answer or otherwise respond to Plaintiff's Complaint.

**FOWLER HIRTZEL MCNULTY &
SPAULDING, LLP**

By:

A handwritten signature in blue ink, appearing to read "J. Fowler", is written over a horizontal line.

Dated: August 25, 2021

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